

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Zadok Z. Pulliam
(DOB: xx/xx/1975)

Case No. 24-M-873(NJ)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 18, 2024 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:*Code Section*18 U.S.C. §§ 922(g)(1) and 924(c)
21 U.S.C. § 841(a)(1)*Offense Description*Felon in possession of a firearm; Use of a firearm in furtherance of drug
trafficking; and Possession with the intent to distribute controlled substances.

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.ALLISON MILLER
(Affiliate)Digitally signed by
ALLISON MILLER (Affiliate)
Date: 2024.06.20 15:08:48
-05'00'*Complainant's signature*

Allison Cerqua, DEA TFO

*Printed name and title*Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 6/21/2024City and state: Milwaukee, Wisconsin*Judge's signature*

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Allison Miller, being duly sworn, hereby dispose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a state certified law enforcement officer who is currently a federally deputized Task Force Officer (T.F.O.) with Group 68 on the Drug Enforcement Administration (D.E.A.) and assigned to the Drug and Gang Task Force with North Central High Intensity Drug Trafficking Area (HIDTA); I have worked full-time as a law enforcement officer for sixteen (16) years. Prior to working at North Central HIDTA, I was assigned to the West Allis Police Department Special Investigations Unit, which primarily investigates crimes involving narcotics trafficking and prostitution; I have received training in the investigation of drug trafficking through my assignments related to narcotics investigations for the West Allis Police Department; I have participated in several narcotics-related investigations, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, thousands of dollars in United States currency and other evidences of criminal activity. As a narcotics investigator, I have interviewed many individuals involved in drug trafficking and has obtained information from them regarding acquisition, sale, importation, manufacture, and distribution of controlled substances. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled substances. I have participated in all aspects of drug investigations, including physical surveillance, execution of search warrants, undercover

transactions, and court-ordered wiretaps, analysis of phones, and arrests of numerous drug traffickers. I have been the affiant on many search warrants. I have also spoken on numerous occasions with other experienced narcotics investigators concerning the methods and practices of drug traffickers.

2. Through my experience in the investigation of firearms, I know that some subjects become obsessed with guns such as: the collection of said items as well as the frequency of use, the retaining of their used targets and spent casings, the unlawful possession and the inability to travel in public without violating Wisconsin's Carrying a Concealed Weapon Law; and photographs of themselves displaying their firearms, which have been commonly observed in persons residences or places that they exercise dominion and control over; I have worked with local, state and federal law enforcement agents investigating the possession, use and trafficking of controlled substances and weapons in the Milwaukee area; affiant has participated in the execution of numerous search warrants in which weapons were seized; I have worked with informants in the investigation of drug trafficking in the Milwaukee area; affiant has participated in search warrants, investigations, and arrests in which controlled substances and drug paraphernalia were seized; I am familiar with the street names of various drugs in the Milwaukee area including marijuana, ecstasy, heroin, fentanyl, and cocaine; I am familiar with methods that are commonly used by drug dealers to package and prepare controlled substances for sale in the Milwaukee area;

3. I have investigated violations of Federal law, directed drug investigations, obtained and executed search and arrest warrants related to the distribution of illegal narcotics and illegal firearm possession, and debriefed confidential informants and cooperating defendants. I am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. Section 2510(7), in that I am empowered by the law to conduct investigations of and to make arrests for federal felony arrests.

4. This affidavit is based upon my personal knowledge and upon information reported to me by other federal and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. Throughout this affidavit, reference will be made to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all my knowledge about this matter.

PROBABLE CAUSE

6. In March 2024, West Allis Police officers became aware of a suspected drug overdose death that occurred in West Allis, Wisconsin. The deceased was an adult female with the initials A.H. At the death scene, West Allis police officers located suspected cocaine and fentanyl. These substances were subjected to presumptive field testing and tested positive as cocaine and fentanyl. Thereafter, West Allis Police conducted an

investigation to determine the source(s) of the suspected cocaine and fentanyl located at the death scene.

7. Case agents located A.H.'s cell phone at the scene of her death and later reviewed A.H.'s most recent contacts. In doing so, case agents observed that phone number 414-698-6915 was in contact with A.H.'s phone within 24 hours of her being located deceased. Based on the content of the text messages, in which it appeared that A.H. was attempting to purchase narcotics from the user of 414-698-6915, case agents identified the user of 414-698-6915 as being involved in supplying cocaine and/or fentanyl to A.H.

8. Case agents secured court authorization for phone location data and a pen register/trap and trace for 414-698-6915. On more than one occasion while case agents were conducting surveillance at the locations where the phone number 414-698-6915 was pinging, Zadok Z. PULLIAM (M/B DOB 04/13/1975) was observed at those same locations. This was consistent with PULLIAM being in possession of the device bearing 414-698-6915. As a result, the user of 414-698-6915 was identified as PULLIAM. Through case agents' investigation, case agents were able to determine that PULLIAM used the residence of 8751 N. 72nd St. Unit # 5 Milwaukee, Wisconsin to further his drug trafficking operation. PULLIAM was also identified as using a white 2018 GMC Yukon bearing WI plate # AGX-9174 (registered to Zadok Z. PULLIAM M/B 04/13/1975 of 2651 N. Palmer St. Milwaukee, WI) and /or white 2022 Dodge Challenger WI plate # AWW-7014 (registered to Zadok PULLIAM M/B 04/13/75 of 2651 N. Palmer St. Milwaukee,

WI) to trip to the Chicago Metro Area, where he was suspected of picking up larger amounts of fentanyl and/or cocaine.

9. On June 18, 2024, at approximately 9:45 a.m., the location data for 414-698-6915 indicated that the device was heading southbound towards Chicago, Illinois. At approximately 10:59 a.m., the location data for 414-698-6915 indicated the device was in Deerfield, Illinois still heading southbound. Investigators knew from Flock databases that the white 2018 Yukon bearing WI plate # AGX-9174 (registered to Zadok Z. PULLIAM M/B 04/13/1975 of 2651 N. Palmer St. Milwaukee, WI) had been in the City of Milwaukee just prior to this trip to Illinois. At approximately 1:00 p.m., the location data for 414-698-6915 showed that the device was headed northbound towards Milwaukee, Wisconsin from Evanston, Illinois. At approximately 1:38 p.m., SA Russell Dykema and TFO John Schott located the white 2018 Yukon bearing WI plate # AGX-9174 traveling north on I94 at W. College Ave. in the City of Oak Creek, County of Milwaukee. SA Dykema advised that the vehicle was traveling approximately 75 mph in a 55mph zone (20 mph over the speed limit) and observed equipment/registration violations.

10. Surveillance units followed the white 2018 Yukon bearing WI plate # AGX-9174 north on I94, where it exited to Port Washington Rd. from W. Silver Spring Dr. (West) exit. At approximately 1:55 p.m., a traffic stop was conducted as the Yukon entered the Bay Shore Mall parking lot at 5800 N. Bayshore Dr. City of Glendale, County of Milwaukee, Eastern District of Wisconsin, by TFO John Schott, SA Russell Dykema, TFO / K9 Officer Christopher Conway and Det. Sharif Said. During this traffic stop, Zadok PULLIAM was identified as the driver and sole occupant of the Yukon.

11. PULLIAM refused to exit the vehicle or unlock the doors. PULLIAM was arrested for resisting arrest. Investigators spoke with PULLIAM, while TFO Conway and his K9 partner Flexy conducted a K9 sniff around the exterior of the white 2018 Yukon bearing WI plate # AGX-9174. TFO Conway advised that K9 Flexy alerted to the odor of controlled substances/narcotics emitting from the white 2018 Yukon bearing WI plate # AGX-9174. Upon a search of the white 2018 Yukon bearing WI plate # AGX-9174, investigators located three cell phones on the center console, one having the number 414-698-6915. Upon a further search of the Yukon, investigators located approximately one kilogram of fentanyl inside a sweatshirt on the back seat. This kilogram was wrapped in cellophane stamped with a "DG." A sample of the substance contained within this kilogram was subjected to the NARK II 33 field test, a test used to detect the presence of fentanyl. The substance tested positive for fentanyl and weighed approximately 1,056 grams.

12. The WE Energies account holder for the residence of 8751 N. 72nd St., Unit #5, was identified as Zadok PULLIAM. A state search warrant was obtained for the residence of 8751 N. 72nd St. Unit # 5 City of Milwaukee, County of Milwaukee, Eastern District of Wisconsin, and executed on June 18, 2024, at approximately 5:50 p.m. A search of the residence revealed numerous identifiers/documents for Zadok PULLIAM throughout the residence, which included documents with the address of 8751 N. 72nd St. There were no occupants present at the residence at time the warrant was executed.

13. During the search of the residence, investigators located six firearms. Specifically, in the living room closet, they located (a) Palmetto State Armory Assault

Rifle Model PA-15 .223; (b) Smith & Wesson MP .40 caliber semiautomatic handgun; (c) Smith & Wesson MP 40C .40 caliber semiautomatic handgun; and (d) Imperial .22 caliber revolver. In the garage, they located a Dickenson 12 gauge shot gun semi-automatic and in the dresser in the northwest bedroom, they located a Smith & Wesson MP Shield .45 caliber semiautomatic handgun.

14. During the search of the residence, investigators also located:

- a. approximately 103 grams of cocaine packaged in various amounts, located in the west wall cabinet of the kitchen:
- b. approximately 3.17 grams of fentanyl in two separate packages, located in the west wall cabinet of the kitchen and in a backpack in the living room closet:
- c. a quantity of marijuana;
- d. approximately one suspected Oxycodone 10 mg pill; and
- e. digital scales, cutting agents, packaging materials, numerous rounds of unfired cartridges (various calibers), and large amounts of United States Currency (approximately \$20,000/pending official count).

15. A sample of the suspected fentanyl located in the residence was subjected to the NARK II 33 field test, a test used to detect the presence of fentanyl. The substance tested positive for fentanyl and weighed approximately 3.17 grams. A sample of the suspected cocaine located in the residence was subjected to the NARK II 07 field test, a test used to detect the presence of cocaine. The substance tested positive for cocaine and weighed approximately 103 grams.

16. Online Wisconsin Circuit Court Records (CCAP) show that Zadok PULLIAM is a convicted felon and is prohibited from possessing firearms. In Milwaukee County case 2010CF002744, PULLIAM was convicted on November 19, 2010, of the felony offense of Child Abuse-Recklessly Cause Harm, in violation of Wisconsin Statute § 948.03(3)(b). This crime is a Class I felony, punishable by a maximum penalty of 18 months of initial confinement and 24 months of extended supervision. Said felony conviction remains of record and unreversed.

17. Case agents are aware that the above-described firearms recovered from PULLIAM's residence on June 18, 2024, were not manufactured in the State of Wisconsin and therefore traveled in interstate commerce prior to that date.

18. Based upon training, experience, and the investigation to date, case agents are aware that approximately 103 grams of cocaine, 1056 grams of fentanyl from the traffic stop and 3.17 grams of fentanyl located in the residence, is not consistent with a personal use quantity of those substances and instead, is consistent with the possession of cocaine and fentanyl with the intent to further distribute the cocaine and fentanyl. Further, based upon said training, experience, and investigation, case agents are aware that the firearms recovered are consistent with being used in furtherance of said drug trafficking offenses.

CONCLUSION

19. Based on the information above, I submit that there is probable cause to believe that on June 18, 2024, Zadok PULLIAM violated 21 U.S.C. § 841(a)(1) (possession with intent to distribute controlled substances), 18 U.S.C. § 922(g)(1) (possession of a

firearm by a felon), and 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking crime).